



Cantor Colburn LLP

March 21, 2025


VIA ECF

Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

The request is GRANTED. The initial pretrial conference is adjourned to **June 5, 2025 at 12:30 p.m.** The deadline to submit a joint letter is adjourned to **May 25, 2025.**

Date: March 24, 2025
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

RE: *Tillo Inc. et al. v. Talli Digital Payments, Inc. et al.*; 1:24-cv-09912; Letter Motion to Adjourn Initial Status Conference and Attendant Case Management Plan and Scheduling Order Deadline

Dear Judge Rochon,

We represent Plaintiffs, Tillo, Inc. and Reward Cloud Limited (collectively, “Tillo” or “Plaintiffs”), in the above-referenced matter, and we write to move the Court to adjourn the Initial Status Conference, currently scheduled for April 1, 2025, as well as the attendant March 21, 2025 deadline for filing a joint letter of counsel to the court with a proposed case management plan and scheduling order.

No previous requests for adjournment or extensions of time have been made. Counsel for defendants Talli Digital Payments, Inc. (“Talli”) and Robert Heffernan (“Heffernan”) have not yet appeared in this matter, and we have not received a response to our request, sent today, for their position on the requested adjournment.

In support of this letter motion, Plaintiffs state as follows:

1. Plaintiffs filed the Complaint in this matter, through the ECF system, on December 23, 2024, through ECF.
2. On December 26, 2024, the Court issued an Order directing all parties to submit a joint letter to the Court as well as a proposed case management plan and scheduling order by March 21, 2025.
3. Since the filing of suit, the parties have exchanged communications concerning potential resolution, but as of this filing no resolution has been reached.



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4. Defendant Talli was served today, March 21, 2025, and provided with a copy of this Order. Defendant Heffernan is a resident of the United Kingdom, and service of Mr. Heffernan is in process under the Hague Convention, but has not yet completed.
5. Neither Defendant has made an appearance in this matter as of the date of this motion.
6. Therefore, Plaintiffs respectfully move, in the interest of the efficient administration of justice and given the circumstances as outlined above, that this Court adjourn the Initial Status Conference in this matter, as well as the attendant deadline for filing a joint letter of counsel to the Court with a proposed case management plan and scheduling order, to a date not less than 60 days from the originally scheduled deadline and date set by the Court.
7. The requested adjournment will provide sufficient time for (a) Plaintiffs to make service on Defendant Heffernan, a foreign defendant; (b) Defendants to file their Answers or otherwise respond; and (c) all parties to cooperate in the drafting and filing of the Court's required joint letter of counsel to the court and proposed case management plan and scheduling order.

WHEREFORE, PLAINTIFFS TILLO, INC. AND REWARD CLOUD LIMITED MOVE THIS COURT TO:

1. ADJOURN THE DEADLINE FOR FILING A JOINT LETTER OF COUNSEL AND PROPOSED CASE MANAGEMENT PLAN AND SCHEDULING ORDER FROM MARCH 21, 2025 TO A DATE AT LEAST 60 DAYS AFTER SAID DATE; AND,
2. ADJOURN THE INITIAL STATUS CONFERENCE FROM APRIL 1, 2025 TO A DATE AT LEAST 60 DAYS AFTER SAID DATE.

Dated: March 21, 2025

Respectfully submitted,

By: /s/ Steven M. Coyle
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Certificate of Service

The undersigned hereby certifies that on March 21, 2025, a copy of the foregoing document was filed electronically using the Court's CM/ECF system. Notice of this filing will be sent by operation of the CM/ECF system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail and e-mail.

By: /s/ Steven M. Coyle
Steven Coyle, Esq.

*Counsel for Tillo Inc. and Reward Cloud
Limited*